

EXHIBIT 16

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
MDL NO. 16-2738 (MAS)(RLS)

IN RE: JOHNSON & JOHNSON :
TALCUM POWDER PRODUCTS :
MARKETING, SALES PRACTICES :
AND PRODUCTS LIABILITY :
LITIGATION :

Remote deposition of JACK
SIEMIATYCKI, MSC, Ph.D., taken in the
above-entitled matter before Suzanne J. Stotz,
a Certified Court Reporter (License No.
30XI00184500) and Notary Public of the State of
New Jersey, taken on Wednesday, March 27, 2024,
commencing at 11:14 a.m. EDT.

1 but it concerns one of the products that has
2 been detected in talc products, one of them.

3 Q. So, in fact, the EPA document does
4 not support your new opinion that talc
5 contained asbestos, correct?

6 MS. PARFITT: Objection. Misstates
7 his testimony entirely.

8 THE WITNESS: That's correct. I
9 would say that's correct, basically.

10 BY MS. DAVIDSON:

11 Q. Okay. And the Dr. Longo documents
12 were provided to you by plaintiff's counsel as
13 well, of course?

14 A. Yeah.

15 Q. Okay. Thank you.

16 Are you offering an opinion on
17 heavy metals in this litigation?

18 A. What do you mean by "an opinion on
19 heavy metals"?

20 Q. Are you offering an opinion that
21 talc contained -- that Johnson's Baby Powder
22 contained heavy metals?

23 MS. PARFITT: Objection to the
24 extent it's foundational. It was covered
25 in his 2019 deposition.

1 You may answer, Dr. Siemiatycki.

2 THE WITNESS: I -- I have read
3 references to the to the detection of
4 metals in talc products. I -- I can't
5 say. It certainly not something that I'm
6 relying upon for any opinions about talc,
7 but it's something that I have read.

8 BY MS. DAVIDSON:

9 Q. Dr. Siemiatycki, did you reach out
10 to IARC and offer yourself as a potential
11 expert on talc issues recently?

12 A. Yes, I did.

13 Q. When was that?

14 A. Probably a year ago or nine months
15 ago. It was following a call by IARC for
16 experts to volunteer to participate in a new
17 monograph evaluation of talc, and I thought I
18 might be useful to them; and I've had a long
19 association with IARC. So I -- I did offer
20 myself in that context.

21 Q. Did you tell the lawyers you were
22 going to do that?

23 A. I don't think I told them before
24 doing it. I can't remember at what point I
25 informed them about it. Maybe only after I had